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MICHAEL S. REYNOLDS

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16 MICHAEL S. REYNOLDS,

No. 3:11-cv-03218-JSW

17 Plaintiff,

18 vs.

19 ALTON ANDERSON LOMAS,

20 Defendant.

**PLAINTIFF'S MOTION FOR
EXTENSION OF TIME TO OPPOSE
DEFENDANT'S MOTION FOR
RELIEF FROM JUDGMENT AND
[PROPOSED ORDER]**

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1 Plaintiff Michael S. Reynolds, through his undersigned attorneys, hereby moves the Court
2 for a brief extension of time within which to respond to Defendant Alton Anderson Lomas's
3 Motion for Relief From Judgment ("Motion"), up to and including August 28, 2012, and in
4 support of this motion, states as follows:

5 1. Defendant filed his Motion for Reconsideration on August 9, 2012. (Doc. 45.)
6 2. Under Local Civil Rule 7 - 3, and Federal Rules of Civil Procedure 5 and 6,
7 Plaintiff's opposition to the Motion is due on Thursday, August 23, 2012.
8 3. At the time the Motion was filed, Plaintiff's litigation counsel had withdrawn from
9 the case, and Plaintiff's collections counsel had substituted therein. Due to the need for
10 Plaintiff's litigation counsel to substitute back into the case and to familiarize themselves with
11 the status of the case and the nature of the Motion, Plaintiff requests additional time, up to and
12 including Tuesday, August 28, 2012, in which to respond to the Motion.

13 4. This is Plaintiff's first request for extension of time.
14 5. The extension is not sought for purposes of delay and, if granted, will not prejudice
15 any party.

16 WHEREFORE, Plaintiff Michael S. Reynolds respectfully requests this Court grant an
17 extension up to and including Tuesday, August 28, 2012 within which Plaintiff may respond to
18 Defendant's Motion for Relief from Judgment.

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20 Dated: August 21, 2012

SNR DENTON US LLP

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22 By: _____ /s/Megan Barker
23 Megan L. Barker

24 Attorney for Plaintiff
MICHAEL S. REYNOLDS

25 Defendant Alton Anderson Lomas's reply shall be filed by no later than September 4, 2012.

26 SO ORDERED:

27 Dated: August 22, 2012

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THE HON. JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE